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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**YOHANDRI RAMO RAMIREZ  
GONZALEZ,**

Defendant.

**Criminal No. 25-CR-088-ABJ**

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**UNOPPOSED MOTION TO EXTEND GOVERNMENT'S  
EXPERT DESIGNATION DEADLINE**

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The United States respectfully requests the Court grant a twenty-one-day extension of the government's expert designation deadline in this case and in support states:

1. This Court entered a discovery order in this case on July 2, 2025. (ECF No. 40). It directed the United States to designate experts "no later than forty-two (42) days prior to trial," which resulted in an expert designation deadline of June 23, 2025. (*See id.*)
2. Since the government's expert witness designation was due 10 days prior to when the Discovery and Scheduling order was entered and a day before the arraignment, the government respectfully asks the Court to extend the government's expert designation

deadline for a period of twenty-one days from June 23, 2025, to July 14, 2025, to permit the United States time to submit its expert designation.

3. Terry Harris, counsel for the defendant, does not oppose this motion.

Respectfully submitted this 3rd day of June 2025.

STEPHANIE I. SPRECHER  
Acting United States Attorney

By: /s/ Z. Seth Griswold  
Z. SETH GRISWOLD  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of July, 2025 the foregoing was electronically filed and consequently served on defense counsel.

/s/ Andi M. Shaffer  
For the United States Attorney's Office